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7 **UNITED STATES DISTRICT COURT**

8 **DISTRICT OF NEVADA**

9 ZACHARY WHITE,	CASE NO. Case No. 2:20-cv-00155-GMN-EJY
10 vs.	
11 Plaintiff,	
12 WAL-MART STORES, INC., a foreign	STIPULATION AND [PROPOSED] ORDER
13 corporation; SAM'S WEST, INC. d/b/a	TO EXTEND DEADLINE FOR PLAINTIFF
14 "SAM'S CLUB #4983," a foreign corporation;	TO RESPOND TO DEFENDANT'S
DOES I-X and ROE ENTITIES I-X, inclusive,	PARTIAL MOTION TO DISMISS
15 Defendants.	PLAINTIFF'S COMPLAINT
	(Second Request)

16 Plaintiff Zachary White ("Plaintiff") and Defendant Sam's West, Inc. d/b/a Sam's Club
17 #4983 ("Defendant") (collectively, the "Parties"), stipulate and agree as follows, under LR IA 6-
18 1, LR IA 6-2, and LR 7-1:

19 1. On March 10, 2020, Defendant filed a Partial Motion to Dismiss Plaintiff's
20 Complaint (the "Motion").

21 2. The Court Clerk has calendared the deadline for Plaintiff to respond to Defendant's
22 Motion as March 24, 2020.

23 3. On March 31, 2020, an Order approving Stipulation and [Proposed] Order to
24 Extend Deadline for Plaintiff to Respond to Defendant's Partial Motion to Dismiss Plaintiff's
25 Complaint (First Request) was entered. The deadline for Plaintiff to respond to the Motion was
26 extended to April 14, 2020

27 4. The Parties agree to extend the deadline for Plaintiff to respond to the Motion by
28 twenty-one (21) days to May 5, 2020.

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5. Counsel for Plaintiff has requested the extension to provide ample time to prepare a response to Defendant's Motion due to the disruption of the office and personnel of counsel for Plaintiff due to the Covid-19 virus, and counsel for Defendant has agreed to the extension.

6. In addition, the Parties are discussing the potential for resolution of this case.

7. This is the second stipulation for an extension of time for Plaintiff to respond to Defendant's Motion, and the Stipulation is not made for purposes of delay.

Dated: April 8, 2020

Dated: April 9, 2020

Respectfully submitted,

Respectfully submitted,

LARSON ZIRZOW KAPLAN & COTTNER

LITTLER MENDELSON, P.C.

/s/ Kory L. Kaplan
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ZACHARY WHITE

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Attorneys for Defendant
SAM'S WEST, INC.

IT IS SO ORDERED.

Dated this 10 day of April, 2020.


Gloria M. Navarro, Dis.

Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT